NOWALSKY, BRONSTON & GOTHARD

A Professional Limited Liability Company Attorneys at Law 3500 North Causeway Boulevard **Suite 1442**

Leon L Nowalsky Benjamin W Bronston Edward P. Gothard

Metairie, Louisiana 70002 Telephone: (504) 832-1984 Facsimile: (504) 831-0892

Moruca Borne Haab Ellen Ann G. Sands Bruce C Betzer Philip R Adams, Jr

January 24, 2005

BY OVERNIGHT DELIVERY

Tennessee Regulatory Authority Ms. Sharla Dillon, Docket Room 460 James Robertson Parkway Nashville, Tennessee 37243-0505

RECEIVED

1.R.A. DOCKET ROOK RE: Application by Network US, Inc. d/b/a CA Affinity and Motion Telecom

Inc. For Approval of an Asset Purchase Agreement

Docket No. 04-00242

Dear Ms. Dillon:

Please find responses to Data Request No. 2 in the above referenced docket.

1. Please explain in detail why Network US, Inc. Has not cleared up its forfeited license with the Tennessee Secretary of State's office?

Network US, Inc. is in the process of clearing up the situation with the Tennessee Secretary of State's office. Network US has changed accounting firms and the current staff is working diligently to prepare the necessary documentation in order to satisfy the Secretary of State. Network US anticipates a prompt resolution to this situation.

- 2. Please explain the circumstances surrounding this petition:
 - Has this transaction been consummated? a.
 - If it was, why was it consummated without Authority ("TRA") approval? b.

The parties entered into a management agreement whereby NUS would manage the customer assets of Motion until such time as all regulatory approvals had been obtained. At this time, all regulatory approvals have been obtained except for TN. c. If it has not, why?

See above.

d. Is Motion Telecom, Inc. still operating in Tennessee under its current CCN?

The parties entered into a management agreement whereby NUS would manage the customer assets of Motion until such time as all regulatory approvals had been obtained.

e. Do you wish to cancel the petition?

No. The parties request TRA approval of the petition, and will endeavor to resolve the issue with the Secretary of State in order to allow the TRA to approve the petition.

Enclosed please find an original and thirteen (13) copies of this response. Please date stamp and return the enclosed extra copy of this letter in the envelope provided.

Please call me should you have any questions concerning this filing. Thank you for your assistance with this matter.

Sincerely,

EllenAnn G. Sands

Enclosures